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Via facisimle and Mail

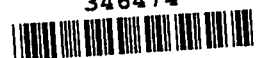
Gwen Zervas, Case Manager
Bureau of Federal Case Management
Department of Environmental Protection
401 East State Street
P. O. Box 028
Trenton, New Jersey 08625

Re: Forwarding of the Work Plan for Delineating and
Characterizing Elevated Lead Concentrations in Soil, for the
L.E. Carpenter/Dayco Site, for BTAG Review and Comment

Dear Ms. Zervas:

As you know from our telephone conversations as well as from my November 3, 2000 letter, addressed to your attention, the Work Plan for Delineating and Characterizing Elevated Lead Concentrations in Soil for the L.E. Carpenter/Dayco Site, Wharton, New Jersey, has been forwarded to BTAG for review and comment. Please note that at this point of the project, the U. S. Environmental Protection Agency (EPA) is required to include BTAG. As a similar note, in 1997 BTAG had previously reviewed and provided comments on a similar work plan for the site. BTAG's comments were then discussed with you as well as incorporated into a comment letter from Carole Petersen to Bruce Venner, dated August 15, 1997. As you know, in an effort to adhere to the current schedule of site progress, I had recently forwarded to you in a timely manner comments from EPA's assigned site hydrologist and risk assessor. In an effort to do the same, I have enclosed the complete version of BTAG's 1997 comments so that you may forward them to the PRP. While we do not believe that the current work plan adequately addresses BTAG's previously expressed concerns, we have asked BTAG to review the current plan so as to update the site file and identify any new issues. Please note, I have also asked BTAG to conduct an expedited review, and any comments will be forwarded to your attention as soon as they have been received and complied.

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Thank you, in advance, for your attention to this matter. If you have any questions, comments, or require further information, please contact me at (212) 637-4411.

Yours truly,

Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section

Enclosure

cc: Carole Petersen, Chief
Andy Crossland, PSB
Michael Sivak, PSB
Mindy Pensak, BTAG Coordinator

bcc: Stephen Cipot, SNJRS

DATE:

SUBJECT: Requested Expedited Biological Technical Assistance Review
LE Carpenter/Dayco Site, Lead Investigation Work Plan

FROM: Mindy Pensak, Coordinator
Biological Technical Assistance Group (DESA-HWSB)

TO: Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section (ERRD-NJRB-S)

As you requested, we are providing the specific information that may be required to evaluate the potential for capping contaminated areas with soil at the LE Carpenter/Dayco Site located in Wharton Borough, Morris County, New Jersey.

The April 1994 Record of Decision (ROD) specified excavation of soils which contain elevated levels of lead. However, during the excavations it was discovered that the extent of contamination was greater than anticipated. Therefore, a change in the remedial action may be proposed.

In order to appropriately evaluate this potential proposal, the extent of lead contamination should be delineated. Reference soil concentrations from the area should also be provided. Since these hot spots areas are within the proximity of the Rockaway River, potential impacts to the River should be assessed. The effects of the river on the cap (i.e. flooding) should also be evaluated. Additionally, including information on the composition of the cap material will assist in the evaluation.

Further assessment of the drainage ditch may be necessary depending on the extent of the lead contamination. Based upon previous data it appears that this ditch may not have been adequately characterized. The elevated concentrations of lead and mercury detected in the sediments may be acting as a potential contaminant source to the Rockaway River.

In order to comply with federal wetlands ARARs, a wetlands assessment and restoration plan would be needed for any wetlands impacted or disturbed by contamination and/or remedial activities. Management practices (Federal Register Volume 51, No. 219, Part 330.6) should be implemented.

If you have any questions, comments, or require further information, please contact Michael Clemetson at (908) 321-6712.

cc: Carole Petersen, ERRD-NJRB
Kim O'Connell, ERRD-NJRB-S
Gina Ferreira, ERRD-PSB
John Cantilli, DEPP-WPB
Bob Witte, DEPP-SPMMPB

Lisa Rosman, NOAA
Allen Jackson, USFWS
Nancy Hamill, NJDEP
Kate Joyce, NJDEP